

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Richard A. Marshack, Trustee MARSHACK HAYS WOOD LLP 870 Roosevelt Irvine, CA 92620 949 333-7777 949 333-7778 FAX E-Mail: rmarshack@marshackhays.com  <input checked="" type="checkbox"/> <i>Movant(s) appearing without an attorney</i> <input type="checkbox"/> <i>Attorney for Movant(s)</i>	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b>	
In re: KRISTINA LYNN SMITH,          Debtor(s).	CASE NO.: 8:24-bk-12527-SC CHAPTER: 7
	<b>DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION  LBR 9013-1(o)(3)</b>
	[No Hearing Required]

1. I am the ☒ Movant(s) or ☐ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (date): 11/03/2025 Movant(s) filed a motion or application (Motion) entitled: Trustee's Application to Employ Hahn Fife & Co., LLP as Accountant [DK 133]
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (date): 11/03/2025 Movant(s), served a copy of ☐ the notice of motion or ☒ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).
6. More than 17 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing was timely filed.
8. No response and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.

9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: 11/22/2025

/s/ Richard A. Marshack  
Signature

Richard A. Marshack  
Printed name

**EXHIBIT 1**

RICHARD A. MARSHACK  
rmarshack@marshackhays.com  
MARSHACK HAYS WOOD LLP  
870 Roosevelt  
Irvine, CA 92620  
Telephone: (949) 333-7777  
Facsimile: (949) 333-7778

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re

KRISTINA LYNN SMITH

Debtor.

Case No. 8:24-bk-12527-SC

Chapter 7

APPLICATION BY CHAPTER 7 TRUSTEE TO  
EMPLOY HAHN FIFE & COMPANY LLP AS  
ACCOUNTANTS; DECLARATION OF  
DONALD T. FIFE IN SUPPORT

[NO HEARING REQUIRED]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER  
INTERESTED PARTIES:

Richard A. Marshack, the Chapter 7 Trustee (“Trustee” or “Applicant”) of the  
Bankruptcy Estate of KRISTINA LYNN SMITH, (the “Debtor”), respectfully files this  
Application for entry of a Court Order authorizing the employment of Hahn Fife & Company  
LLP as the Trustee’s accountant in this case pursuant to 11 U.S.C. § 327(a) (the “Application”).

1. PROCEDURAL HISTORY

On October 3, 2024, Debtor filed a petition for bankruptcy under Chapter 7 of Title 11  
(the “Petition Date”).

1 2. SERVICES TO BE PERFORMED

2 Applicant proposes to employ Hahn Fife & Company, LLP (“Hahn Fife” or the “Firm”)  
3 to provide accounting services to the bankruptcy estate that include preparing and filing  
4 necessary state and federal estate tax returns, review of financial documents and any other  
5 reasonable duties assigned by the Trustee.

6 3. QUALIFICATIONS OF THE FIRM

7 As indicated by the attached Declaration of Donald T. Fife (the “Fife Declaration”), Hahn  
8 Fife is experienced in bankruptcy accounting matters, including those involving trustees,  
9 bankruptcy estates, and tax matters included in bankruptcy estates. The firm is competent to  
10 perform the requisite accounting services in this case. The members’ breadth of experience and  
11 length of service is described in the resumes copies of which are attached as Exhibit “1.”

12 4. THE FIRM IS DISINTERESTED

13 Except as disclosed herein and to the best of the Firm's knowledge, neither the Firm, nor  
14 any of the professionals comprising or employed by it, has any connection with the Debtor or the  
15 Debtor’s attorneys or accountants, the Debtor’s creditors, or any other outside party in interest,  
16 or their respective attorneys or accountants.

17 Based on the foregoing, the Trustee believes that the Firm is a “disinterested person”  
18 within the meaning of Bankruptcy Code Section 101(14).

19 The Firm does not have an interest adverse to the Debtor or the bankruptcy Estate. As of  
20 the Petition Date, the Firm was not a creditor of the Estate and was not owed any funds by the  
21 Debtor.

22 To the best of the Firm’s knowledge, and as set forth in the attached Fife Declaration,  
23 none of the professionals comprising or employed by the Firm are related to any judge of the  
24 United States Bankruptcy Court for the Central District of California, the United States Trustee,  
25 or any person currently employed in the Office of the United States Trustee.

26 5. COMPENSATION PROCEDURE

27 Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court  
28 may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C.

1 Sections 330 for an allowance of fees and reimbursable costs not more often than every 120  
2 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept  
3 compensation and reimbursements of expenses in such amounts that the Court may award.  
4 There will be no written employment agreement apart from this Application. The only source of  
5 payment or compensation will be the estate. No retainer has been paid or is being proposed to  
6 Hahn Fife.

7 The Firm has advised the Trustee that the Firm has not shared or agreed to share any  
8 compensation to be received by it in this case with any other person, except as among partners of  
9 the Firm.

10 6. CONCLUSION

11 Trustee respectfully requests an order: (1) authorizing the employment of Hahn Fife as  
12 accountants, effective October 30, 2025, as an administrative expense of the estate upon the  
13 terms and conditions in this application; (2) granting for such other and further relief as is just  
14 and proper.

15 Dated: November 2, 2025

Respectfully submitted,

16  
17 By: /s/ Richard A. Marshack  
18 RICHARD A. MARSHACK  
Chapter 7 Trustee for the Bankruptcy Estate of  
19 Kristina Lynn Smith  
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**DECLARATION OF DONALD T. FIFE**

I, DONALD T. FIFE, declare as follows:

1. I am a duly-licensed certified public accountant in the State of California and a Partner in the firm of Hahn Fife & Company, LLP and maintain offices at 1055 E. Colorado Blvd., 5<sup>th</sup> Floor, Pasadena, CA 91106, telephone number 626/792-0855.

2. I have personal knowledge of the facts in this Declaration and, if called as a witness, could competently testify to these facts.

3. The firm is experienced in bankruptcy matters, including those involving trustees, bankruptcy estates, and issues relating to the tax effects from sale of estate assets. I am competent to perform the requisite accounting services in this case. The firm's breadth of experience and length of service is described in my resume, a copy of which is attached as Exhibit "1."

4. The firm is familiar with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules, and will comply with the Code and Rules.

5. I agree to the terms and conditions of employment in the foregoing application. I am willing to accept compensation and reimbursement of expenses in such amounts that the Court may award. I understand that my compensation may be modified under U.S.C. Section 330, if so warranted. No retainer has been paid or is being proposed to me.

6. The Firm completed a conflicts check prior to submitting this Application.

7. To the best of my knowledge, neither the Firm, nor any of the persons comprising or employed by it, has any connection with the Debtor or the Debtor's attorneys or accountants, the Debtor's creditors, or any other outside party in interest, or their respective attorneys or accountants, except that the Firm represents Richard A. Marshack in his capacity as bankruptcy trustee in other unrelated cases.

8. The Firm is not and was not an investment banker for any outstanding security of the Debtor.

9. The Firm has not been within three (3) years before the date of the filing of the

petition herein, an investment banker for a security of the Debtor, or an attorney for such an investment banker in connection with the offer, sale or issuance of any security of the Debtor.

10. The Firm is not and was not, within two (2) years before the date of the filing of the petition herein, a director, officer or employee of the Debtor or of any investment banker for any security of the Debtor.

11. As of the Petition Date, the Firm was not a creditor of the Estate, an equity security holder or an insider of the Debtor. The Firm has no pre-petition claim against Debtor's Estate and was not owed any funds by the Debtor.

12. The Firm neither holds nor represents any interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or an investment banker for any security of the Debtor, or for any other reason.

13. To the best of my knowledge, none of the professionals comprising or employed by the Firm are related to any judge of the United States Bankruptcy Court for the Central District of California, the United States Trustee, or any person currently employed in the Office of the United States Trustee.

14. The Firm does not have an interest adverse to the Debtor or the bankruptcy Estate.

15. Based on the foregoing, the Trustee believes that the Firm is a "disinterested person" within the meaning of Bankruptcy Code § 101(14).

After conducting or supervising the investigation described in Paragraph 6 above, I declare under penalty of perjury, that the foregoing is true and correct except that I declare that Paragraphs 7 through 15 are stated on information and belief.

Executed on 11-1-25, in Pasadena, California.

  
DONALD T. FIFE



**EXHIBIT 1**

**Firm Statement of Qualifications**

The Firm was formed in September of 2003 and provides accounting and consulting services relating primarily to bankruptcy, litigation, turnaround, fraud and receivership matters. The Firm's professionals have extensive experience and training in these specialized fields of accounting practice and have served a broad range of clients in Southern California for many years. Following are brief summaries of the qualifications of firm's current professional staff. It is expected that the Firm will add professional staff as required to serve client needs.

***Donald T. Fife, CPA***

Mr. Fife currently practices exclusively in bankruptcy, turnaround and litigation consulting, providing services such as financial analysis, forensic accounting, tax services and expert witness testimony. He serves clients such as bankruptcy trustees, creditors, debtors, creditor's committees and parties to civil litigation.

Mr. Fife has over 30 years of business and financial experience in accounting, bankruptcy, turnaround, taxation and fraud investigation. He formerly practiced as an accountant and consultant with Price Waterhouse, FTI Policano & Manzo, PHB Hagler Bailly, Inc., Biggs & Company and Spicer & Oppenheim. Over the last 25 years, his career has been concentrated in the areas of bankruptcy, turnaround, and litigation support.

Mr. Fife is a Certified Public Accountant licensed in California. He is also a member of the American Institute of Certified Public Accountants, the California Society of CPA's, the National Association of Bankruptcy Trustees, the American Bankruptcy Institute, and the California Bankruptcy Forum. He received his bachelor's degree in Business Administration/Accounting from California State University at Los Angeles.

Hourly Rate: \$530.00

**RATES FOR REIMBURSEMENT OF INCURRED EXPENSES  
HAHN FIFE & COMPANY, LLP**

PHOTOCOPYING	\$0.10 PER PAGE
TELECOPIER - INCOMING	\$0.15 PER PAGE
OUTGOING	\$1.00 PER PAGE
MILEAGE	\$0.27 PER MILE
TELEPHONE	ACTUAL COST
POSTAGE	ACTUAL COST
MESSENGER	ACTUAL COST
OVERNIGHT MAIL	ACTUAL COST
ON-LINE COMPUTER RESEARCH	ACTUAL COST
FILING FEES	ACTUAL COST
DEPOSITION OR WITNESS FEES	ACTUAL COST
PARKING	ACTUAL COST

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt Avenue, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (*specify*): **APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY HAHN FIFE & COMPANY LLP AS ACCOUNTANT; DECLARATION OF DONALD T. FIFE IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 2, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **David Coats** dacoats@raslg.com
- **Benjamin Heston** bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net
- **Richard G. Heston** rheston@hestonlaw.com, yflores@hestonlaw.com, docs@hestonlaw.com, HestonRR41032@notify.bestcase.com, hestonlaw@recap.email
- **Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com
- **Matthew J Stockl** mstockl@otterbourg.com, katrice.ortiz@dinsmore.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Julie J Villalobos** julie@oaktreelaw.com, oakecfmail@gmail.com; villalobosjr51108@notify.bestcase.com; gus@oaktreelaw.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On **November 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

KRISTINA LYNN SMITH  
27591 KATHY CT  
LAGUNA NIGUEL, CA 92677-6025

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 3, 2025      Pamela Kraus  
Date                      Printed Name

/s/ Pamela Kraus  
Signature

**EXHIBIT 2**

RICHARD A. MARSHACK  
rmarshack@marshackhays.com  
MARSHACK HAYS WOOD LLP  
870 Roosevelt  
Irvine, CA 92620  
Telephone: (949) 333-7777  
Facsimile: (949) 333-7778

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re  
KRISTINA LYNN SMITH  
  
Debtor.

Case No. 8:24-bk-12527-SC

Chapter 7

NOTICE OF APPLICATION BY CHAPTER 7  
TRUSTEE TO EMPLOY HAHN FIFE &  
COMPANY LLP AS ACCOUNTANTS

[NO HEARING REQUIRED]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER  
INTERESTED PARTIES:

PLEASE TAKE NOTICE that Richard A. Marshack, the Chapter 7 Trustee (“Trustee” or  
“Applicant”) of the Bankruptcy Estate of KRISTINA LYNN SMITH, (the “Debtor”), has filed  
an Application for entry of a Court Order authorizing the employment of Hahn Fife & Company  
LLP as the Trustee’s accountant in this case pursuant to 11 U.S.C. § 327(a) (the “Application”)  
effective October 30, 2025.

On October 3, 2024, Debtor filed a petition for bankruptcy under Chapter 7 of Title 11  
(the “Petition Date”).

1 Applicant proposes to employ Hahn Fife & Company, LLP (“Hahn Fife” or the “Firm”)  
2 to provide accounting services to the bankruptcy estate that include preparing and filing  
3 necessary state and federal estate tax returns, review of financial documents and any other  
4 reasonable duties assigned by the Trustee.

5 Applicant proposes to retain Hahn Fife upon the following basis: Except as the Court  
6 may otherwise determine, after due notice, Hahn Fife will petition the Court under 11 U.S.C.  
7 Sections 330 for an allowance of fees and reimbursable costs not more often than every 120  
8 days. The petition will be heard upon notice to necessary parties. Hahn Fife will accept  
9 compensation and reimbursements of expenses in such amounts that the Court may award.  
10 There will be no written employment agreement apart from this Application. The only source of  
11 payment or compensation will be the estate. No retainer has been paid or is being proposed to  
12 Hahn Fife.

13 The Firm has advised the Trustee that the Firm has not shared or agreed to share any  
14 compensation to be received by it in this case with any other person, except as among partners of  
15 the Firm.

16 The Firm’s current hourly billing rates are as follows:

Timekeeper	Rate
Donald T. Fife	\$530.00

17  
18  
19 The complete scope and terms of the employment are detailed in the Application a copy  
20 of which can be obtained by contacting Donald T. Fife at 790 E. Colorado Blvd., 9<sup>th</sup> Floor,  
21 Pasadena, CA 91101. The Application is based on 11 U.S.C. Section 327 and the Firm intends  
22 to seek compensation pursuant to 11 U.S.C. Sections 330 and 331.

23 **PLEASE TAKE FURTHER NOTICE** that any response and request for hearing as to  
24 the proposed employment must be in the form as required by Local Bankruptcy Rules 2014-1(b),  
25 9013-1(f) and (o) and filed with the Clerk of the above-entitled Court. The deadline for any  
26 response and request for hearing is 14 days after the date of service of this Notice, plus an  
27 additional 3 days unless this Notice was served by personal delivery or posting as described in  
28 F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any response or request for hearing must be served on

1 Richard A. Marshack at the address indicated above and Donald T. Fife at 790 E. Colorado  
2 Blvd., 9<sup>th</sup> Floor, Pasadena, CA 91101. A copy must also be served on the Office of the United  
3 States Trustee, 411 W. Fourth Street, Suite 7160, Santa Ana, California 92701. Failure to timely  
4 respond may be deemed as acceptance of the proposed employment. See Local Bankruptcy  
5 Rules 9013-1(h).

6  
7 Dated: November 2, 2025

Respectfully submitted,

8  
9 By: /s/ Richard A. Marshack  
10 RICHARD A. MARSHACK  
11 Chapter 7 Trustee for the Bankruptcy Estate of  
12 Kristina Lynn Smith  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt Avenue, Irvine, CA 92620

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF APPLICATION BY CHAPTER 7 TRUSTEE TO EMPLOY HAHN FIFE & COMPANY LLP AS ACCOUNTANT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 2, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **David Coats** dacoats@raslg.com
- **Benjamin Heston** bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net
- **Richard G. Heston** rheston@hestonlaw.com, yflores@hestonlaw.com, docs@hestonlaw.com, HestonRR41032@notify.bestcase.com, hestonlaw@recap.email
- **Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com
- **Matthew J Stockl** mstockl@otterbourg.com, katrice.ortiz@dinsmore.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov
- **Julie J Villalobos** julie@oaktreelaw.com, oakecfmail@gmail.com; villalobosjr51108@notify.bestcase.com; gus@oaktreelaw.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On **November 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

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3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 3, 2025      Pamela Kraus  
Date                      Printed Name

/s/ Pamela Kraus  
Signature

**2. SERVED BY UNITED STATES MAIL:** continued

**DEBTOR**

KRISTINA LYNN SMITH  
27591 KATHY CT  
LAGUNA NIGUEL, CA 92677-6025

**SECURED CREDITOR / POC ADDRESS**

THE NESHANIAN LAW FIRM  
AMY NESHANIAN  
5 CORPORATE PARK, STE 250  
IRVINE, CA 92606-5169

**20 LARGEST CREDITOR / POC ADDRESS**

A CENTER FOR CHILDREN  
1111 W CHAPMAN AVE  
ORANGE, CA 92868-2828

**20 LARGEST CREDITOR / POC ADDRESS**

AT&T SERVICES, INC.  
BY AIS INFOSOURCE LP AS  
AGENT  
KAREN CAVAGNARO, ESQ.  
1 AT&T WAY, ROOM 3A104  
BEDMINSTER, NJ 07921-2693

**20 LARGEST CREDITOR**

BANK OF AMERICA  
ATTN: BANKRUPTCY  
4909 SAVARESE CIRCLE  
TAMPA, FL 33634-2413

**20 LARGEST CREDITOR**

COX COMMUNICATIONS  
6205 PEACHTREE DUNWOODY RD  
ATLANTA, GA 30328-4524

**20 LARGEST CREDITOR / POC ADDRESS**

DREW HUNT  
4 PARK PLAZA SUITE 200  
IRVINE, CA 92614-8533

**20 LARGEST CREDITOR / POC ADDRESS**

FRANCHISE TAX BOARD  
BANKRUPTCY SECTION MS A340  
PO BOX 2952  
SACRAMENTO CA 95812-2952

**20 LARGEST CREDITOR / POC ADDRESS**

HOWARD SMITH  
28822 VIA DE LUNA  
LAGUNA NIGUEL, CA 92677-7601

**20 LARGEST CREDITOR / POC ADDRESS**

JEFF GOMEZ  
PO BOX 1718  
UPLAND, CA 91785-1718

**20 LARGEST CREDITOR / POC ADDRESS**

JEFFREY ADAMS GOMEZ  
1388 AUGUSTA DRIVE  
UPLAND, CA 91786-2432

**20 LARGEST CREDITOR / POC ADDRESS**

KERRY KAVANAUGH  
4511 ISABELLA LANE  
DALLAS, TX 75229-5410

**20 LARGEST CREDITOR**

KOHL'S  
ATTN: CREDIT ADMINISTRATOR  
PO BOX 3043  
MILWAUKEE, WI 53201-3043

**20 LARGEST CREDITOR**

LEON BAGINSKI MD  
27800 MEDICAL CENTER RD 310  
MISSION VIEJO, CA 92691-6461

**20 LARGEST CREDITOR**

MISSION PROVIDENCE HOSPITAL  
27799 MEDICAL CENTER RD  
MISSION VIEJO, CA 92691-6400

**20 LARGEST CREDITOR**

MOULTON WATER  
26161 GORDON RD  
LAGUNA HILLS, CA 92653-8224

**20 LARGEST CREDITOR**

PEDIATRICSDERMATOLOGY  
3500 BARRANCA PKWY 160  
NEWPORT BEACH, CA 92696

**20 LARGEST CREDITOR**

PROGRESSIVE INSURANCE  
6300 WILSON MILLS RD  
CLEVELAND, OH 44143-2182

**20 LARGEST CREDITOR / POC ADDRESS**

R&S LAW GROUP, APC  
230 NEWPORT CENTER DRIVE  
SUITE 210  
NEWPORT BEACH, CA 92660-7525

**20 LARGEST CREDITOR**

ROWAN DORCY MEDICAL  
27799 MEDICAL CENTER RD  
MISSION VIEJO, CA 92691-6400

**20 LARGEST CREDITOR**

SDG&E  
PO BOX 25111  
SANTA ANA CA 92799-5111

**20 LARGEST CREDITOR**

SGSB LAW  
19762 MACARTHUR BLVD STE 200  
IRVINE, CA 92612-2497

**20 LARGEST CREDITOR**

US ACUTE CARE SOLUTION  
4535 DRESSIER RD NW  
CANTON, OH 44718

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION [LBR 9013-1(o)(3)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 11/22/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/22/2025  
Date

Pamela Kraus  
Printed Name

/s/ Pamela Kraus  
Signature

- **David Coats** dacoats@raslg.com
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